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[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
Luis Javier Vazquez, and Kyle Kingsbury, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF JOSEPH R.
SAVERI IN SUPPORT OF
PLAINTIFFS' MOTION IN LIMINE
NO. 18 TO EXCLUDE EVIDENCE
CONCERNING EVENTS, CONDUCT,
OR FACTS WHERE ZUFFA
OBJECTED TO AND DID NOT
PRODUCE DISCOVERY
CONCERNING SUCH EVENTS,
CONDUCT, OR FACTS**

I, Joseph R. Saveri, Esq., declare and state as follows:

1. I am the founder of the Joseph Saveri Law Firm, LLP and one of the Court appointed Co-Lead Class Counsel to represent the Bout Class in *Le v. Zuffa, LLC*, No. 2:15-cv-1045 (D. Nev.). I am a member in good standing of the California bar and have been admitted pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I make this declaration pursuant to 28 U.S.C. § 1746.

2. Defendant Attached as **Exhibit T** is a true and correct copy of Defendant Zuffa, LLC's Responses to Plaintiffs' First Set of Requests for Production, dated June 9, 2015.

3. Attached as **Exhibit U** is a true and correct copy of correspondence from Zuffa's counsel John Cove to Plaintiffs' counsel Michael Dell'Angelo, dated August 26, 2015.

4. Attached as **Exhibit V** is a true and correct copy of correspondence from Michael Dell'Angelo to John Cove, dated September 7, 2015.

I declare under penalty of perjury and the laws of the United States that the foregoing is true and correct. This Declaration was executed in San Francisco, California on February 29, 2024.

Dated: February 29, 2024

By: /s/ Joseph R. Saveri

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